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JUL - 1 2004

July 1, 2004 FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
Portals II
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

Re: Report and Order Issued in CC Docket No. 96-128; Released October 3, 2003

Dear Ms. Dortch:

Our client, Pioneer Long Distance, Inc., is a switched-based reseller of long distance services in the State of Oklahoma, subject to the provisions of the Federal Communications Commission's ("FCC") reporting obligations to payphone service providers as set forth in the FCC's Report and Order issued in CC Docket No. 96-128¹ ("Payphone Order"). Pursuant to the Order, and as set forth in 47 C.F.R. §64.1320(a), Pioneer Long Distance is to file with the FCC a System Audit Report attesting that Pioneer Long Distance's payphone call tracking and payment system meets the FCC's requirements as set forth in the Payphone Order and 47 C.F.R. §64.1320(c)(d) and (e).

Pioneer Long Distance has been diligently preparing for the July 1, 2004 implementation date of the requirements of the Payphone Order, and to date is tracking all dial-around calls made and completed from payphone service providers' ("PSP") payphones utilizing Pioneer Long Distance's platform. Pioneer Long Distance is compiling this data and will transmit this information by the January 1, 2005 deadline for the 3rd quarter of 2004. Pioneer Long Distance's employees have held numerous meetings and conference calls in the past few months to implement internal policies and procedures for compliance with the Payphone Order. Notwithstanding Pioneer Long Distance's diligent efforts to comply with the terms of the Payphone Order, it is requesting an additional sixty (60) days in order to file the initial System Auditor's Report with the FCC. Pioneer Long Distance has been in contact with the payphone clearinghouses, such as APCC, and representatives for the PSPs to devise a method to identify

¹ *In the Matter of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*; CC Docket No. 96-128, Released October 3, 2003.

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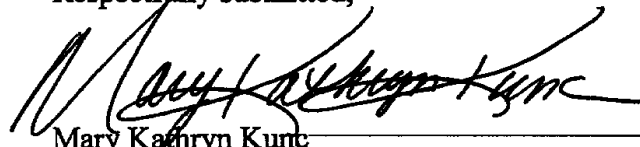
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the PSP associated with the FLEX ANI they are tracking, and a final solution has not yet been attained. The criteria to determine the identities of the PSPs to which Pioneer Long Distance owes compensation appears to be an industry-wide problem that all affected carriers are faced with. Pioneer Long Distance believes that with the cooperation of the payphone clearinghouses and PSPs, a method to properly identify the PSP with the ANI can be attained in the short term. As such, Pioneer Long Distance cannot yet complete and file its System Auditor's Report with the FCC because the auditor must include Pioneer Long Distance's criteria for determining the identity of the PSPs associated with the ANI.

For the reasons set forth herein, Pioneer Long Distance respectfully requests the FCC allow it an additional sixty (60) days to file its System Auditor's Report.

Should you have any questions concerning this matter please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mary Kathryn Kunc', is written over a horizontal line.

Mary Kathryn Kunc
For the Firm

MKK/nh

cc: Qwest Communications Corporation
APCC Services
National Payphone Clearinghouse
Sprint Communications Company, L.P.